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9 **Natalie Sramek**

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12 **UNITED STATES DISTRICT COURT**
13 **IN THE NORTHERN DISTRICT OF CALIFORNIA**

14 **Natalie Sramek,**

Case No.: 15-cv-04873-HSG

15 **Plaintiff,**

**STIPULATED REQUEST TO
MOVE INITIAL CASE
MANAGEMENT CONFERENCE
AND EXTEND TIME FOR
SERVICE AND DEFENDANTS'
TIME TO ANSWER**

16 **vs.**

17 **California Highway Patrol ("CHP");**
18 **CHP Commissioner Joseph Farrow;**
19 **CHP Officer Sean Harrington;**
20 **CHP Officer Robert Hazelwood;**
21 **individually and in their official capacities**
22 **as peace officers; and DOES 1-100,**

23 **Defendants.**
24 _____/

25 Pursuant to Civil Local Rule 6-2, the parties hereby submit their stipulated
26 request to extend time for service and for Defendants' time to answer, and to move the
27 initial Case Management Conference currently scheduled for January 26, 2016, at 2:00
28 p.m., for the following reasons:

1. This action is one of two cases filed in the above-captioned court, that
involve all or a material part of the same subject matter and all, or substantially all, of
the same parties as this action. This stipulated request is being simultaneously made in
the other case as well (*Vogt vs. CHP, et al.* Case No. 15-cv-05199-JCS).

2. In both actions, Defendant, California Highway Patrol (by and through the
Office of the Attorney General, State of California) received plaintiff's "Notice of a

1 Lawsuit and Request to Waive Service of Summons,” along with the Complaint, and all
2 other required documents on December 14, 2015. Subsequently, the parties have
3 engaged in a good faith dialogue regarding several anticipated issues, including the
4 status and perfection of service of the Complaint on the individual defendants. The
5 stipulated requested extension will provide the parties additional time to ensure all
6 parties are properly served and represented for appearance in the action.

7 3. The parties have conferred and share an interest in an efficient and
8 economical approach to managing this litigation, and are evaluating with their clients
9 the possibility of engaging in early private mediation. To that end, the parties believe
10 that moving the initial Case Management Conference and extending Defendants’ time to
11 appear and respond to the Complaint would prevent premature expenditure of resources
12 and allow the Parties to further organize, confer on, and evaluate the two pending
13 related actions filed in this District for efficient management.

14 4. Therefore, the parties stipulate and jointly request that new dates in this
15 matter be assigned and ordered as follows:

- 16 · Service of all Defendants on or before March 1, 2016
- 17 · Extend Defendants’ time to answer to April 15, 2016
- 18 · Initial Case Management Conference on or about May 17, 2016 (with other
19 associated deadlines continued accordingly).

20 5. There have been no previous requests or orders for time modification in
21 the case. The requested extension of time will not appreciably delay proceedings in this
22 action, and will enable more efficient and economical management of the litigation. No
23 parties will be prejudiced, and all parties will remain similarly positioned to proceed
24 without further delay.

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IT IS SO STIPULATED AND REQUESTED.

Dated: January 13, 2016

By: /s/ Richard A. Madsen, Jr.

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By: /s/ Wil Fong

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Attorney for Defendant
California Highway Patrol

**PURSUANT TO STIPULATION, IT IS SO ORDERED EXCEPT THAT THE
CASE MANAGEMENT CONFERENCE WILL BE HELD ON MAY 10, 2016.**

Dated: January 14, 2016


Honorable Haywood S. Gilliam, Jr.